

From: [Sivak, Michael](#)
To: [Filipowicz, Urszula](#); [Metz, Chloe](#); [Nace, Charles](#); [Olsen, Marian](#); [McPherson, Julie](#); [Smith, Lora](#); [States, Abbey](#); [Maddaloni, Mark](#)
Subject: RE: HHRA zoning and exposure questions
Date: Monday, July 27, 2015 9:19:00 AM

Ula: please see my reply below.

Michael Sivak
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From: Filipowicz, Urszula
Sent: Thursday, July 23, 2015 2:24 PM
To: Metz, Chloe; Nace, Charles; Olsen, Marian; McPherson, Julie; Smith, Lora; States, Abbey; Sivak, Michael; Maddaloni, Mark
Subject: HHRA zoning and exposure questions

Hi Risk Assessors,

I'm reviewing a PAR and have two questions I'd like to get your feedback on.

1. The PRP wrote the following statement:

"This area is zoned office/residential, thus the non-wetlands portions of the site could potentially be developed for office or residential purposes in the future"

Since the zoning of the wetlands is residential, should the risk assessment assume future residential use for the wetland portion of the exposure area as well? Or is that just so unrealistic that the wetland portion can be left out of the evaluation? Other portions of the site (which I believe are more contaminated... but I'd have to look at the data more closely and confirm) are being evaluated for sed and sw exposures by future recreators/nearby residents already... so in theory, assuming contamination is less in this area, can the risk assessment state that exposures via recreational activities would be similar as in the other area of the site? This way this small area wouldn't need a separate evaluation?

Ula, if the local zoning is residential, I suggest you include it. Although unlikely due to engineering issues, residential development is allowed by the zoning, and that's one of the major factors we consider when identifying potential future uses. It may be that if there is unacceptable risk under a potential future residential use, then the FS would consider ICs to change the land use to some non-residential use. At Rolling Knolls, which is a swamp, we made them look at residential use because that was the zoning.

2. There's a portion of the site that crosses a road (double yellow line road with single lanes in both directions); 8 soil boring were collected from beneath the road at a depth of 2-2.5ft bgs. Zoning of the area where the samples were collected, including the road, is residential. Should the soil at this depth be considered for a future residential scenario (same as we do for parking lots)?

I would say the same thing – it's zoned residential. However, the HHRA should state that residential exposure to soils under the building is not currently happening, but if those soils present an unacceptable risk (and you might want to look at them as a separate exposure area), if there is road construction, for example, and those soils are removed for some reason, they should be disposed of appropriately.

Any feedback is highly appreciated!

Thanks,

-Ula

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